

The Honorable Judge Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UGOCHUKWU GOODLUCK  
NWAUZOR and FERNANDO  
AGUIRRE-URBINA, individually and on  
behalf of all those similarly situated,

Plaintiff and counter-defendant,  
v.

THE GEO GROUP, INC., a Florida corporation,

Defendant and counter-plaintiff.

Case No: 3:17-cv-05769-RJB

**REPRESENTATION STATEMENT;  
EXHIBIT A TO GEO'S NOTICE OF APPEAL**

NWAUZOR et al. v. THE GEO GROUP, INC.  
ECF CASE NO. 3-17-cv-05769  
REPRESENTATION STATEMENT

III BRANCHES LAW, PLLC  
Joan K. Mell  
1019 Regents Blvd. Ste. 204  
Fircrest, WA 98466  
253-566-2510 ph  
[joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

## **REPRESENTATION STATEMENT**

Pursuant to Ninth Circuit Rule 3-2 and Federal Rule of Appellate Procedure 12(b), The  
GEO Group, Inc. files this representation statement.

1. The plaintiff class representatives and counter-defendants are Ugochukwu Goodluck Nwauzor and Fernando Aguirre-Urbina, who represent a class certified by the district court at ECF No. 114. Chao Chen is a counter-defendant, but not a class representative. They are represented by:

SCHROETER GOLDMARK & BENDER

Adam J. Berger

Lindsay L. Halm

Jamal N. Whitehead

810 Third Avenue, Suite 500

Seattle, WA 98104

Tel: (206) 622-8000

Fax: (206) 682-2305

berger@sgb-law.com

[halm@sgb-law.com](mailto:halm@sgb-law.com)

whitehead@sgb-law.com

THE LAW OFFICE OF R. ANDREW FREE

THE END OF

Andrew Free

P.O. Box 90568

P.O. BOX 96500  
Nashville TN 37209

Tel: (844) 321-3221

Fax: (615) 829-8959

Toll: (813) 329-3969  
andrew@immigrantcivilrights.com

SUNBIRD LAW, PLLC

Devin T. Theriot-Orr, WSBA # 33995

1001 Fourth Avenue, Suite 3200

Seattle, WA 98154-1003

Tel: (206) 962-5052

Fax: (206) 681-9663

devin@sunbird.law

NWAUZOR et al. v. THE GEO GROUP, INC.  
ECF CASE NO. 3:17-cv-05769  
REPRESENTATION STATEMENT

III BRANCHES LAW, PLLC  
Joan K. Mell  
1019 Regents Blvd. Ste. 204  
Fircrest, WA 98466  
253-566-2510 ph  
[joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)

1 MENTER IMMIGRATION LAW, PLLC  
2 Meena Menter, WSBA # 31870  
3 8201 164th Ave NE, Suite 200  
4 Redmond, WA 98052  
5 Tel: (206) 419-7332  
meena@meenamenter.com  
(represents Nwauzor)

6 2. Defendant and conditional counter-plaintiff is The GEO Group, Inc. ("GEO").

7 GEO is represented by:

8 III BRANCHES LAW, PLLC  
9 Joan K. Mell  
10 1019 Regents Blvd. Ste. 204  
Fircrest, WA 98466  
11 Tel: 253-566-2510  
Fax: 281-664-4643  
12 joan@3brancheslaw.com

13 GREENBERG TRAURIG LLP  
14 Scott A Schipma  
15 2101 L ST NW, Ste. 1000  
Washington, DC 20037  
16 Tel: (202) 331-3141  
schipmas@gtlaw.com

17 NORTON ROSE FULBRIGHT US LLP  
18 Charles A. Deacon (Pro Hac Vice)  
300 Convent St.  
19 San Antonio, Texas 78205  
Tel: (210) 270-7133  
20 Fax: (210) 270-7205  
charlie.deacon@nortonrosefulbright.com

22 NORTON ROSE FULBRIGHT US LLP  
23 Mark Emery (Pro Hac Vice)  
799 9th Street NW, Suite 1000  
24 Washington, DC 20001-4501  
Tel: (202) 662-0210  
25 Fax: (202) 662-4643  
mark.emery@nortonrosefulbright.com

27  
28 NWAUZOR et al. v. THE GEO GROUP, INC.  
ECF CASE NO. 3-17-cv-05769  
REPRESENTATION STATEMENT

III BRANCHES LAW, PLLC  
Joan K. Mell  
1019 Regents Blvd. Ste. 204  
Fircrest, WA 98466  
253-566-2510 ph  
joan@3brancheslaw.com

1 NORTON ROSE FULBRIGHT US LLP  
2 Andrea D'Ambra  
3 1301 Avenue of the Americas  
4 New York, NY 10019  
5 andrea.dambra@nortonrosefulbright.com

6 Dated: September 5, 2018

7 **NORTON ROSE FULBRIGHT US LLP**  
8 Charles A. Deacon (Pro Hac Vice)  
9 300 Convent St.  
10 San Antonio, Texas 78205  
11 Telephone: (210) 270-7133  
12 Facsimile: (210) 270-7205  
13 charlie.deacon@nortonrosefulbright.com

14 **NORTON ROSE FULBRIGHT US LLP**  
15 Mark Emery (Pro Hac Vice)  
16 799 9th Street NW, Suite 1000  
17 Washington, DC 20001-4501  
18 Telephone: (202) 662-0210  
19 Facsimile: (202) 662-4643  
mark.emery@nortonrosefulbright.com

20 **NORTON ROSE FULBRIGHT US LLP**  
21 Andrea D'Ambra (Pro Hac Vice)  
22 1301 Avenue of the Americas  
23 New York, NY 10019  
24 Telephone: (212) 318-3000  
25 Facsimile: (212) 318-3400  
26 andrea.dambra@nortonrosefulbright.com

27  
28 **ATTORNEYS FOR DEFENDANT**  
**THE GEO GROUP, INC.**

NWAUZOR et al. v. THE GEO GROUP, INC.  
ECF CASE NO. 3-17-cv-05769  
REPRESENTATION STATEMENT

**III BRANCHES LAW, PLLC**

By:   
Joan K. Mell  
1019 Regents Blvd. Ste. 204  
Fircrest, WA 98466  
253-566-2510 (p)  
281-664-4643 (f)  
joan@3brancheslaw.com

**GREENBERG TRAURIG LLP**  
Scott A Schipma (Pro Hac Vice)  
2101 L ST NW, Ste. 1000  
Washington, DC 20037  
Telephone: (202) 331-3141  
schipmas@gtlaw.com

III BRANCHES LAW, PLLC  
Joan K. Mell  
1019 Regents Blvd. Ste. 204  
Fircrest, WA 98466  
253-566-2510 ph  
joan@3brancheslaw.com

## **CERTIFICATE OF SERVICE**

I, Joseph Fonseca, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action.

On September 5, 2018, I electronically filed the above GEO's Representation Statement, with the Clerk of the Court using the CM/ECF system and served via Email to the following:

Schroeter, Goldmark & Bender  
Adam J. Berger, WSBA No. 20714  
Lindsay L. Halm, wSBA No. 37141  
Jamal N. Whitehead, WSBA No. 39818  
810 Third Avenue, Suite 500

The Law Office of R. Andrew Free  
Andrew Free  
P.O. Box 90568  
Nashville, TN 37209  
[andrew@immigrationcivilrights.com](mailto:andrew@immigrationcivilrights.com)

Devin Pierot O’Hearn  
1001 Fourth Avenue, Suite 3200  
Seattle, WA 98154  
[devin@sunbird.law](mailto:devin@sunbird.law)

Norton Rose Fulbright US LLP  
Andrea D’Ambra (Pro Hac Vice)  
1301 Avenue of the Americas  
New York, NY 10019

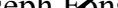
Norton Rose Fulbright US LLP  
Mark Emery (Pro Hac Vice)  
799 9th St. NW, Suite 1000  
Washington, DC 20001-4501  
(202)-662-0210  
[mark.emery@nortonrosefulbright.com](mailto:mark.emery@nortonrosefulbright.com)

andrea.dambra@nortonrosefulbright.com

Meena Pallipamu Menter  
8201 164th Ave. N.E., Suite 200  
Seattle, WA 98052  
(206)-419-7332  
[meena@meenamenter.com](mailto:meena@meenamenter.com)

I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

DATED this 5th day of September, 2018 at Fircrest, Washington.

  
Joseph Fonseca, Paralegal

**NWAUZOR et al. v. THE GEO GROUP, INC.  
ECF CASE NO. 3-17-cv-05769  
REPRESENTATION STATEMENT**

III BRANCHES LAW, PLLC  
Joan K. Mell  
1019 Regents Blvd. Ste. 204  
Fircrest, WA 98466  
253-566-2510 ph  
[joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)